

G. MARK ALBRIGHT, ESQ. (1394)
DANIEL R. ORMSBY, ESQ. (14595)
KYLE W. FENTON, ESQ. (16235)
ALBRIGHT STODDARD, WARNICK & ALBRIGHT
801 South Rancho Drive, Suite D-4
Las Vegas, Nevada 89106
Telephone: (702) 384-7111 / F: (702) 384-0605
gma@albrightstoddard.com
dormsby@albrightstoddard.com
kfenton@albrightstoddard.com

MICHAEL MACHAT, ESQ.
CA Bar No. 109475
Appearing *pro hac vice*
MACHAT & ASSOCIATES, P.C.
8730 W. Sunset Blvd., Ste. 250
W. Hollywood, California 90069
Telephone: (310) 860-1833
michael@machatlaw.com
Attorneys for Plaintiff

UNITED STATES DISTRICT

DISTRICT OF NEVADA

Sonia Feldman, an individual

Plaintiff,

vs.

Mark Anthony Sawyer; Jennifer Ann Sawyer;
Nevada MJS Trust; The Property Located at
6940 N. Jensen Street, Las Vegas, NV 89149-
1365; The Property Located at 508 Setting
Moon Street, North Las Vegas, NV 89084-
1258; The Vacant Land located at APN# 125-
19-203-002; ATD Commerce, LLC; ACM
North, LLC; MAS Holdings Group, LLC.; and
Sawyer Holdings, LLC,

Defendants.

CASE NO.: 2:24-cv-00526-JCM-MDC

**NOTICE OF NO OPPOSITION TO
PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT [ECF 37]**

Plaintiff Sonia Feldman, an individual, by and through her counsel of record, G. MARK ALBRIGHT, ESQ., of ALBRIGHT, STODDARD, WARNICK and MICHAEL MACHAT, ESQ., of MACHAT & ASSOCIATES, P.C., appearing Pro Hac Vice, hereby files Notice of No Opposition to Plaintiff's Motion for Summary Judgment [ECF 37], filed on March 6, 2025.

Pursuant to Local Rule LR 7-2(b), any opposition to a motion must be filed within 21 days after service of the motion. In the instant matter, Plaintiff Sonia Feldman served a copy of her Motion for Summary Judgment [ECF 37] via electronic mail, regular mail and certified mail, to the last known emails and addresses of Defendants on March 7, 2025. Thereby, Defendants' opposition or other response was due on March 28, 2025. Further, as of today's date, Defendants who are appearing pro se, have not filed and/or served an opposition or other response to Plaintiff's Motion for Summary Judgment.

Under Local Rule LR 7-2(d), "[t]he failure of an opposing party to file points and authorities in response to any motion, except a motion under Fed. R. Civ. P. 56 or a motion for attorney's fees, constitutes a consent to the granting of the motion." While the Court is still required to evaluate the motion on its merits under Fed. R. Civ. P. 56(e), Plaintiff respectfully submits that the motion is unopposed and properly supported by the record, and requests that the Court consider the motion for decision.

DATED this 4th day of April, 2025

ALBRIGHT, STODDARD, WARNICK
& ALBRIGHT

//s/ G. Mark Albright
G. MARK ALBRIGHT, ESQ. (1394)
DANIEL R. ORMSBY, ESQ. (14595)
KYLE W. FENTON, ESQ. (16235)
801 South Rancho Drive, Suite D-4
Las Vegas, Nevada 89106
Telephone: (702) 384-7111 / F: (702) 384-0605
gma@albrightstoddard.com
dormsby@albrightstoddard.com
kfenton@albrightstoddard.com

MICHAEL MACHAT, ESQ.
CA Bar No. 109475
Appearing *pro hac vice*
MACHAT & ASSOCIATES, P.C.
8730 W. Sunset Blvd., Ste. 250
W. Hollywood, California 90069
Telephone: (310) 860-1833
michael@machatlaw.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of ALBRIGHT, STODDARD, WARNICK & ALBRIGHT and that on this 4th day of April, 2025, service of a true and correct copy of the foregoing **NOTICE OF NO OPPOSITION TO PLAINTIFF'S MOTION**

FOR SUMMARY JUDGMENT was made to all counsel of record as follows:

MARK ANTHONY SAWYER	Certified Mail
dba MAS Financing	Electronic Filling/Service
6940 N. Jensen Street	X Email
Las Vegas, NV 89149-1365	Facsimile
<u>Msawyer2729@yahoo.com</u>	Hand Delivery
<i>Defendant</i>	X Regular Mail

JENNIFER SAWYER	Certified Mail
6940 N. Jensen Street	Electronic Filling/Service
Las Vegas, NV 89149-1365	X Email
<u>Jen61002@hotmail.com</u>	Facsimile
<i>Defendant</i>	Hand Delivery
	X Regular Mail

NEVADA MJS TRUST	Certified Mail
6940 N. Jensen Street	Electronic Filling/Service
Las Vegas, NV 89149	Email
<i>Defendant</i>	Facsimile
	Hand Delivery
	X Regular Mail

THE PROPERTY LOCATED AT	Certified Mail
6508 Setting Moon Street	Electronic Filling/Service
North Las Vegas, NV 89084-1258	Email
<i>Defendant</i>	Facsimile
	Hand Delivery
	X Regular Mail

ATD COMMERCE, LLC	Certified Mail
C/O US Corporate Solutions, LLC	Electronic Filling/Service
2685 S. Rainbow Blvd., Ste. 213	Email
Las Vegas, NV 89146	Facsimile
<i>Defendant</i>	Hand Delivery
	X Regular Mail

ACM NORTH, LLC	Certified Mail
C/O US Corporate Solutions, LLC	Electronic Filling/Service
2685 S. Rainbow Blvd., Ste. 213	Email
Las Vegas, NV 89145	Facsimile
<i>Defendant</i>	Hand Delivery
	X Regular Mail

MAS HOLDINGS GROUP, LLC	Certified Mail
C/O US Corporate Solutions, LLC	Electronic Filling/Service
2685 S. Rainbow Blvd., Ste. 213	Email
Las Vegas, NV 89145	Facsimile
<i>Defendant</i>	Hand Delivery

AS Albright Stoddard
Warnick & Albright

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SAWYER HOLDINGS, LLC
C/O Jeffrey Burr, LTD
2600 Paseo Verde Pkwy., Suite 200
Henderson, NV 89074
Defendant

X Regular Mail

Certified Mail
Electronic Filing/Service
Email
Facsimile
Hand Delivery

X Regular Mail

//s// **Phyllis L. Cameron**

An employee of Albright, Stoddard, Warnick &
Albright

Phyllis Cameron

From: Phyllis Cameron
Sent: Friday, April 4, 2025 11:52 AM
To: Mark Sawyer; jen61002@hotmail.com
Cc: Mark Albright; Michael Machat; Kyle Fenton
Subject: Sonia Feldman v. Mark A. Sawyer et.al. / 2:24-cv-526 / Notice of No Opp to Plaintiff's Motion for Summary Judgment
Attachments: 2025-04-04 Feldman. Notc of No Opp to P's MSJ.e.file.d.e.served.emailed.mailed.FINAL.pdf

Dear Mark Sawyer and Jennifer Sawyer:

Please find attached in the above matter NOTICE OF NO OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT [ECF 37].

I have also mailed this document to your last known address(es).

Thank you!

Respectfully,

Phyllis L. Cameron

Paralegal to
G. Mark Albright, Esq.

**AS Albright Stoddard
Warnick & Albright**

801 South Rancho Drive, Suite D-4
Las Vegas, Nevada 89106
T: (702) 384-7111
pcameron@albrightstoddard.com
www.albrightstoddard.com

LAW OFFICES

Albright, Stoddard, Warrick & Albright

A PROFESSIONAL CORPORATION

QUAIL PARK SUITE D-4

801 SOUTH RANCHO DRIVE

LAS VEGAS, NEVADA 89106

MAS HOLDINGS GROUP, LLC
C/O US Corporate Solutions, LLC
2685 S. Rainbow Blvd., Ste. 213
Las Vegas, NV 89145

Note of No Opp [37]

LAW OFFICES

Albright, Stoddard, Warrick & Albright

A PROFESSIONAL CORPORATION

QUAIL PARK SUITE D-4

801 SOUTH RANCHO DRIVE

LAS VEGAS, NEVADA 89106

SAWYER HOLDINGS, LLC
C/O Jeffrey Burr, LTD
2600 Paseo Verde Parkway, Ste. 200
Henderson, NV 89074

Note of No Opp [37]



LAW OFFICES
Albright, Stoddard, Wernick & Albright
A PROFESSIONAL CORPORATION
QUAIL PARK SUITE D-4
801 SOUTH RANCHO DRIVE
LAS VEGAS, NEVADA 89106

MARK ANTHONY SAWYER
dba MAS Financing
6940 N. Jensen Street
Las Vegas, NV 89149-1365

1.0 ntc of No Opp re: [37]

LAW OFFICES
Albright, Stoddard, Wernick & Albright
A PROFESSIONAL CORPORATION
QUAIL PARK SUITE D-4
801 SOUTH RANCHO DRIVE
LAS VEGAS, NEVADA 89106

JENNIFER SAWYER
6940 N. Jensen Street
Las Vegas, NV 89149-1365



1.0 ntc of No Opp re: [37]

LAW OFFICES

Albright, Stoddard, Warrick & Albright

A PROFESSIONAL CORPORATION

QUAIL PARK SUITE D-4

801 SOUTH RANCHO DRIVE

LAS VEGAS, NEVADA 89106

THE PROPERTY LOCATED AT
6508 Setting Moon Street
North Las Vegas, NV 89084-1258

Note of no OPP [37]

LAW OFFICES

Albright, Stoddard, Warrick & Albright

A PROFESSIONAL CORPORATION

QUAIL PARK SUITE D-4

801 SOUTH RANCHO DRIVE

LAS VEGAS, NEVADA 89106

NEVADA MJS TRUST
6940 N. Jensen Street
Las Vegas, NV 89149

NOTE FAX OPP NO. [37]



LAW OFFICES

Albright, Stoddard, Warrick & Albright

A PROFESSIONAL CORPORATION

QUAIL PARK SUITE D-4

801 SOUTH RANCHO DRIVE

LAS VEGAS, NEVADA 89106

\$0.97 0
US POSTAGE IME
FIRST-CLASS
063S0001443193
FROM 89106



ATD COMMERCE, LLC
C/O US Corporate Solutions, LLC
2685 S. Rainbow Blvd., Ste. 213
Las Vegas, NV 89145

Note of NO OPP [32]

LAW OFFICES

Albright, Stoddard, Warrick & Albright

A PROFESSIONAL CORPORATION

QUAIL PARK SUITE D-4

801 SOUTH RANCHO DRIVE

LAS VEGAS, NEVADA 89106

\$0.97 0
US POSTAGE IME
FIRST-CLASS
063S0001443193
FROM 89106



ACM NORTH, LLC
C/O US Corporate Solutions, LLC
2685 S. Rainbow Blvd., Ste. 213
Las Vegas, NV 89145

Note of NO OPP [32]